



**Privacy Impact Assessment
for the**

Financial Management System

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Contact Point

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Federal Student Aid (FSA)

U.S. Department of Education



1. What information will be collected for the system (Ex. Name, Social Security Number, annual income, etc)?

FMS collects or receives information directly and from feeder systems that enable the recording, processing, and reporting of all FSA financial transactions in summary or detail. Data definitions and file layouts for all information and sources are documented in the FMS design documents and in the FMS Trading Partner Agreements.

FMS receives and processes specifically identifiable personal information (i.e., social security number and either borrower name and address or institution name and address) only for processing certain DLS, CDDTS, Perkins, and DLC refund payments. When CSB (Common Services for Borrowers) Phase 2 is implemented, this refund payment functionality will be migrated from FMS to CSB and FMS will cease to receive and process this specifically identifiable personnel information.

Personnel information is also currently received from DLS in detail data files for summary GL posting in FMS. This information is processed in FMS at a summary level (i.e., where personal information is not specifically identifiable) and the detail is not maintained. Historically, the detail has been passed from FMS to the Credit Management Data Mart (CMDM) for reporting. As of mid-December 2004, however, FMS ceased sending this detail to CMDM. CMDM was retired effective 2004 calendar yearend.

2. Why is this information being collected?

FSA collects personally identifiable information (e.g., borrower name, address, and social security number) to allow payment processing on borrower refunds.

3. How will FSA use this information?

FMS collects this information to meet Treasury requirements on payments (e.g., to allow Treasury to calculate Treasury offsets on payments to borrowers). FMS, until mid-December 2004, sent information to CMDM to allow detail reporting.

4. Will this information be shared with any other agency? If so, with which agency or agencies?

Personally identifiable information is provided to Treasury on the SF1166 files prepared for payment on DLC, DLS, and CDDTS refunds.



5. Describe the notice or opportunities for consent would be/ or are provided to individuals about what information is collected and how that information is shared with others organizations. (e.g., posted Privacy Notice).

All individuals who apply for an FMS user ID must review and sign FMS' Privacy Act Statement. The FMS SSO will not assign any user IDs without a signed statement.

All users who access FMS receive the following Government System warning prompt that includes a Privacy Act Notice each time they enter FMS:



External users who access FMS via FSA's Financial Partners portal are "provided" the following privacy statement:

<http://www.fp.ed.gov/PORTALSWebApp/fp/privacy.jsp>

Also, the Privacy Notices of the systems interfacing with FMS provide individuals with notice of what information is collected and how the information is shared with other organizations.

6. How will the information be secured? (An overview of security controls described in the system security plan (Technical Controls section) would be applicable to answer this question.)

The general public is not allowed access to the FMS system. VDC, the General Service Support provider, offers some security features such as firewall and intrusion detection. The Oracle application provides FMS the ability to restrict access to the database and operating system. Public partners have inquiry only access to information that is placed in a protected public network outside the internal network. FMS uses standard encryption algorithms for communications between the application and the Oracle Database.



Within the Oracle application, personal information is stored for invoices on three tables. Oracle enforces the control of least privilege on these tables. Access is restricted by FMS responsibility and Organization. That is, only individuals granted the FSA-DLS GL Users responsibility and assigned the DLS_OU (or Operating Unit) organization may view this data. These users are required to have a 6C clearance.

For DLS, CDDTS, and Perkins refunds, the borrower's social security number is embedded within the invoice number. The borrower's name is stored in a different table. In many cases, the borrower's name and address information will reflect instead the lender institution that created and holds the loan. In these cases, the lender will pass the refund to the borrower (as identified by SSN).

For DLC refunds, the Borrower's social security number is also embedded within the invoice number. The borrower's name is stored in a different table. The address fields for DLC refunds are the same as for other refunds, but for these refunds the address information applies to the lender in all cases, not the borrower. The lender passes the refunds to the borrower as identified by SSN.

For the CDDTS and DLC refunds, these users enter this data directly into the tables via the standard Oracle invoice and supplier forms. FMS enforces separation of duties between invoice and supplier creation and payment creation. The payments can be reviewed within the standard payments form to those users given access.

For the DLS and Perkins refunds, data files received from the feeder systems are staged in FMS within a table. This table is only accessible through back-end or DBA access.

7. Is a system of records being created or updated with the collection of this information? (A system of record is created when information can be retrieved from the system by the name of the individual or an identifying number, symbol or other identifying particular assigned to an individual. Also, in responding to this question a helpful reference may be to the system's System of Record organization step completed in the Definition phase of the Solution Lifecycle process.)

Yes



8. List the web addresses (known or planned) that will have a Privacy Notice.

External users can access FMS from the FSA Financial Partners portal at:
<http://www.fp.ed.gov/PORTALSWebApp/fp/fms.jsp>

The privacy statement for that portal is located at:
<http://www.fp.ed.gov/PORTALSWebApp/fp/privacy.jsp>

Internal (and other) users can access the production version of FMS on FSA's intranet or via the internet at the following URL:
http://hpl10.ed.gov:8000/PROD_j.htmT. Users who type this URL into their web browser will receive the government warning pop-up window described in the response to question 5 of this PIA questionnaire.